

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC.; and DYNAMIC SECURITY,  
INC.

Defendants.

Case No. 2:19-CV-767-ECM

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**PLAINTIFF'S WILL USE EXHIBIT 28**

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8/1/2017

Print

**Subject:** Re: Fwd: Mailroom new hire  
**From:** Tracy Peoples (tpeoples@dynamicsecurity.org)  
**To:** chargrove@dynamicsecurity.org;  
**Cc:** sspires@dynamicsecurity.org;  
**Date:** Monday, July 31, 2017 4:19 PM

Chris, If the officer they hired is not a fit (because she was pregnant) when they hired her the only way I can see her being removed is if she does not comply with rules and regs regarding hair.

Sherry, any thoughts on the below email?

V/R  
 Tracy

*Tracy R. Peoples*  
 Vice President of Operations  
 Dynamic Security INC.  
 1102 Woodward Ave.  
 Muscle Shoals, AL 35661  
 Office: (256) 383-5798 Ext 211  
 Cell: (901) 827-0335  
 Fax: (256) 810-5242  
 Email: [tpeoples@dynamicsecurity.org](mailto:tpeoples@dynamicsecurity.org)

**From:** Chris Hargrove <[chargrove@dynamicsecurity.org](mailto:chargrove@dynamicsecurity.org)>  
**To:** Tracy Peoples <[tpeoples@dynamicsecurity.org](mailto:tpeoples@dynamicsecurity.org)>  
**Sent:** Monday, July 31, 2017 1:34 PM  
**Subject:** Fwd: Mailroom new hire

FYI.

Sent from my iPhone

Begin forwarded message:

**From:** "Robinson, Gloria A - Dynamic Security" <[gloriarobinson@hmmausa.com](mailto:gloriarobinson@hmmausa.com)>  
**Date:** July 31, 2017 at 2:10:47 PM EDT  
**To:** "chargrove@dynamicsecurity.org" <[chargrove@dynamicsecurity.org](mailto:chargrove@dynamicsecurity.org)>  
**Cc:** Ray Cureton <[rcureton@dynamicsecurity.org](mailto:rcureton@dynamicsecurity.org)>, "Williams, Cassandra - Hyundai ENG America" <[CWilliams@hmmausa.com](mailto:CWilliams@hmmausa.com)>  
**Subject:** Mailroom new hire

Good morning,

Ms. Davita Key was hired on as the new mailroom person. During the interview, prior to hire—I had contacted Ms. Williams in reference to Ms. Key's hairstyle. They would be considered dreads or locks, if you will. Either way, they are not allowed for the security officers here at HMMA. Ms. Key showed Ms. Williams and I a picture of how she could have her hairstylist change the appearance of them, to make them look a bit neater.

Fast forward to today—Monday July 31, 2017 @ 0730 hours.

Ms. Key asked to talk to Lt. Chambliss and I in private and at that time told us that she just found out she was pregnant. Keep in mind that she was hired for the mailroom—and although neither male or female are allowed to lift more than 50 pounds. I take issue with her working in the mailroom. To top this off, she had a doctor's note (see attached) stating that she could return to work with no restrictions—not sure where the 'return to work' came from, today was her first day. Apparently she informed her trainer, Ms. Howell, that she is due in January. This means she was with child during the interview with me—but did not disclose this. Although she stated that she 'just found out July 28.

2<sup>nd</sup> topic—her hair. Apparently while she was in the security video training on Thursday, she asked Ms. Nicole if she thought anything was wrong with her hair. Unbeknownst to Ms. Nicole why Ms. Key would ask her that question, Ms. Nicole said no, she didn't have a problem with it.

So, at this point, I believe Ms. Key figured since Ms. Nicole was the officer manager, she (Key) would just take it upon herself to NOT change her hairstyle. Ms. Williams reminded her of the conversation the three of us had prior to being hired, but Ms. Key seemed to want more explanation—such as asking to see the policy—which she was shown. I informed Ms. Key that HMMA has a different set of standards for security officers. Either way—Ms. Williams asked her if she could have her stylist change her hair—Ms. Key stated that the lady does not work on a Tuesday, and is normally booked up. She was also given the option to wear a hat that would contain her hair, of course she lives 30 minutes away. At this point, I just told her to go home and to call me when she is able to get an appointment and we will go from there.

about:blank

1/2

Dynamic - Key 000078

8/1/2017

Print

After she left I did call her and ask her if she informed her doctor what type of work she would be doing, she said yes---sounded rather shaky, but she went on to say that when she worked in the post office, she was pregnant and was delivering 100 pds. of mail a day and worked up until two days prior to delivery.

I am asking for some assistance here---what recourse do I have with her? As of this e-mail she has not called back to let me know if she has a hair appointment.

If she is due in five (5) months, unless I cannot count (which I can't) she is already four (4) months---and didn't know it?

**G. Robinson**  
**Dynamic Security**  
**Cell: (334) 328-2852**  
**Desk: (334) 387-8909**

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**Attachments**

- DOC073117-005.pdf (45.29KB)

Jackson Clinic • 1758 Park Place, MONTGOMERY AL 36106-1137

KEY, DAVITA (id #101538, dob: 12/10/1985)

# THE JACKSON CLINIC

## Return to Work / School

Patient: KEY, DAVITA  
DOB: 12/10/1985  
Address: 7096 TAYLOR CROSSING DR APT G  
MONTGOMERY, AL 36117-7801

Date: 07/28/2017  
Patient ID: 101538

### Note to Patient:

- ☒ Was Seen in my office on: 07/28/17
- ☐ Please excuse from work/school for: \_\_\_\_\_ days
- ☐ May return to work/school on: \_\_\_\_\_
- ☐ May Not return to work/school on: \_\_\_\_\_
- ☒ Work limitations: No restrictions Release to full duty
- ☐ May Not participate in physical education: \_\_\_\_\_
- ☐ May return to physical education: \_\_\_\_\_
- ☐ Limitations for physical education: \_\_\_\_\_
- ☐ May Not participate in jury duty: \_\_\_\_\_

Sincerely,



**AL - Jackson Hospital**

Jackson Obstetrics and Gynecology  
1758 Park Place Suite 301  
MONTGOMERY, AL 36106-1137.  
Phone: (334) 284-1500 Fax:(334) 288-7763

DAVITA KEY  
DOB: 12/10/1985  
Patient ID: 101538

**Upcoming Appointments**

Date	Time	Appointment	Dept./Address	Phone
08/24/2017	03:15 PM	Follow-Up OB LATOYA CLARK, MD	Jackson Obstetrics and Gynecology 1758 Park Place Suite 301 MONTGOMERY, AL 36106-1137.	(334) 284-1500